

Discovery Completed to Date

The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). Plaintiff has served written discovery upon the Defendant, and Defendant has provided responses. Defendant has served written discovery on Plaintiff and responses are not yet due. Defendant has subpoenaed five sets of medical records. Plaintiff has served an expert witness report and Defendant has identified an expert it would like to use. Plaintiff has noticed the deposition of Kevin Kelly for Thursday, February 17, 2022.

Discovery Remaining to Be Completed

In addition to general complications from dealing with the global pandemic and restrictions of COVID-19, Plaintiff's contested motion to file a First Amended Complaint was granted on January 20, 2022 (ECF No. 39), adding three individual defendants to the case, which have yet to be served and have not yet had time to answer or appear in this case. Additional discovery as to these individuals will need to wait until such time as they have appeared in the case, and pending discovery may also be delayed as the new individual defendants should be permitted the opportunity to participate in discovery and defend the depositions in order to avoid duplication of efforts.

Reason for Requested Extension

Defendant, K-Kel requested this extension of the answer deadline to permit Defendant additional time to file objections to the Order which otherwise would be due on the same day, and Defendant also wanted additional time to see if individual defendants had been served and retained counsel.

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1 This extension is sought in good faith and should not prejudice the rights of any
2 party in this case or cause undue delay.

3 Dated this 11th day of February, 2022.

4 FISHER & PHILLIPS, LLP

GILBERT EMPLOYMENT
LAW, P.C.

6 /s/ Allison L. Kheel, Esq.

/s/ Kathryn Black, Esq.

7 Scott M. Mahoney, Esq.

Kathryn Black, Esq. (*Pro Hac Vice*)

Allison L. Kheel, Esq.

Gary M. Gilbert, Esq., (*Pro Hac Vice*)

8 300 S. Fourth Street, Suite 1500

1100 Wayne Ave., Ste. 900

Las Vegas, NV 89101

Silver Spring, MD 20910

9 Attorneys for Defendant, K-Kel,
10 Inc.

JAMES P. KEMP, Esq.

KEMP & KEMP

7435 West Azure Drive, Suite 110

Las Vegas, NV 89130

Attorneys for Plaintiff

14 **IT IS SO ORDERED.**

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16 UNITED STATES MAGISTRATE JUDGE

17 February 14, 2022

18 DATED

FISHER & PHILLIPS LLP

300 S Fourth Street, Suite 1500
Las Vegas, Nevada 89101